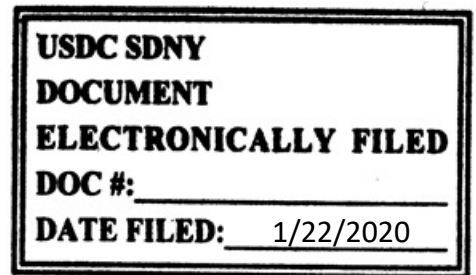


TRAVIS LAW PLLC

80 Maiden Lane, Suite 304  
New York, New York 10038  
Tel: (212) 248-2120  
www.travislawnyc.com



January 21, 2020

VIA ECF

Hon. Stewart D. Aaron  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Agapito v. Amir Ram Bagels, Inc., et al.*  
Case No.: 18-CV-8079 (ALC) (SDA)  
Extension of Time to File Motion for Extension of the Stay

Dear Magistrate Judge Aaron:

Our firm represents the defendants (“Defendants”) in the above-referenced action. On January 8, 2020, Your Honor ordered Defendants to file a formal motion for extension of the Chapter 11 automatic stay to the individual defendants Mohammed Kamal, Imanuel Halon, Amir Ram, and Hossam Zebib. Defendants’ Bankruptcy Counsel, Morrison Tenenbaum, PLLC, will be drafting and filing Defendants’ motion. At the request of bankruptcy counsel, Defendants respectfully request a two-week extension of time to file the motion from January 22, 2020 to and including February 5, 2020; Plaintiff’s opposition shall be due no later than February 26, 2020, and Defendants shall file a reply no later than March 4, 2020. This is Defendants’ first request for an extension of time to file their motion. Plaintiff consents to this request and to the proposed briefing schedule.

Respectfully submitted,

/s/

Christopher R. Travis

cc: Cilenti & Cooper, PLLC (*via ECF*)

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Stewart D. Aaron", written over a horizontal line.

Hon. Stewart D. Aaron  
U.S. Magistrate Judge

Dated: 1/22/2020